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Attorneys for Defendant
LINDA PARKS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

UNITED STATES OF AMERICA and
THE STATE OF CALIFORNIA, *ex rel.*
SHELBY EIDSON,

Plaintiffs,

vs.

AURORA LAS ENCINAS, LLC,
LINDA PARKS, SIGNATURE
HEALTHCARE SERVICES LLC, and
DOES 1 through 10, jointly and
severally,

Defendants.

CASE NO.: 2:10-cv-1031 JAK (RZx)

(Hon. John A. Kronstadt)

**PARKS' DECLARATION IN
SUPPORT OF HER MOTION FOR
PROTECTIVE ORDER**

Date: To be determined

Time: To be determined

Crtrm: 540

Judge: Honorable Ralph Zarefsky

I, Linda Pitman (previously known at times as Linda Parks), declare as follows:

1. I am a defendant in the within lawsuit. I know the facts stated herein to be true of my own knowledge and if called upon to testify thereto could and would so competently.

2. I have worked in the mental health field for 30 years as a registered nurse and in various administrative capacities. I was the Chief Executive Officer at Aurora Las Encinas Hospital ("Hospital") between September 2007 and September 2009. This was the only period I had any relationship with the Hospital. Before

1 joining the Hospital in 2007, I had worked hard for 25 years to establish and
 2 cultivate a reputation for clinical excellence in the mental health field. During the
 3 period I worked at the Hospital, I had no responsibility or role in the preparation or
 4 submission of hospital bills and government cost reports.

5 3. I do not know Relator and do not recall ever seeing her before
 6 February 6, 2013, at my deposition. I have been personally, professionally, and
 7 financially devastated by the allegations she has made against me in the various
 8 versions of her Complaint in this case. None of the allegations of “wrongdoing” is
 9 true. Many of the allegations appear to be based on an utter and complete lack of
 10 understanding of the administration and operation of a hospital or health facility.
 11 For example, her allegation that patients were moved out of the Hospital during
 12 government surveys is not only untrue but demonstrates that the Relator does not
 13 appear to know that Hospital administration and employees do not make patient
 14 admission, discharge, or treatment decisions regarding hospital patients. Rather,
 15 such decisions are made by the patients’ attending physicians who are not employed
 16 by the Hospital. This is one of many examples of the invalidity of relator’s
 17 allegations.

18 4. I am also extremely troubled by the fact that the Relator made false and
 19 defamatory statements about me to Hospital employees, to at least one doctor on the
 20 Hospital’s medical staff, and to newspaper reporters before she filed her lawsuit.
 21 For example, in an October 25, 2008 email to a doctor, she suspected me of “getting
 22 some sort of kickback,” which is not only untrue but never even ended up in the
 23 allegations in her lawsuit. The psychiatric community in Southern California is a
 24 relatively small group. These extremely serious (albeit false) allegations of
 25 dishonesty and those in the complaint and in the newspapers and on the internet
 26 have circulated among people in the psychiatric community in Southern California,
 27 including past, present and future employers. I know for a fact that the allegations
 28 have damaged my reputation in the health care industry. because I have been asked

1 about them in job interviews. As a result, once, I resigned my position at the
 2 Hospital, I was unable to find work in another position for 18 months. In fact, one
 3 prospective employer called me after a very successful telephone interview, to tell
 4 me she was unable to hire me because of what she found out about me on the
 5 internet. When I finally obtained a position at another hospital in the San Fernando
 6 Valley, some of the staff who I was trying to hold accountable to an attendance
 7 policy told the administration at the other hospital about my being named as a
 8 defendant in a whistleblower action. Persons within the administration told me the
 9 complaining staff members had heard about the lawsuit from the Relator and her
 10 friends. The reputation of a hospital administrator or nurse is extremely critical to
 11 the his or her ability to pursue a career, just as it is for a doctor. My reputation and
 12 my ability to work in this field in the Southern California area has been and
 13 continues to be harmed by this ongoing litigation and events leading up to it.

14 5. I do not trust the Relator or her counsel because of their past actions
 15 toward me. They obviously have no regard for my privacy, my personal belongings,
 16 or my reputation. The relator's actions, by her own admission, have been illegal and
 17 have shown a wanton disregard for other federal and state laws. This fact is
 18 demonstrated by the Relator's efforts to break into my office at the Hospital to try to
 19 obtain information adverse to me and others, and her total disregard of the
 20 confidentiality of patient and hospital records. I believe the Relator would stop at
 21 nothing to try to justify her allegations in this case.

22 6. Due in large part to the actions of the Relator and some of her
 23 colleagues, the Hospital has been subject to an inordinate amount of publicity and
 24 surveys by regulatory agencies. This very small community hospital became the
 25 subject of national attention as the relator and the LA Times reporter tried to infer
 26 that one of our celebrity doctors was somehow involved in some of the incidents
 27 alleged in the newspaper. The LA Times even used a picture of the celebrity doctor
 28 in one of its articles. It was very difficult for me to implement sustainable and

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1 lasting changes during my tenure because of the never-ending scrutiny by regulators
 2 and the officious actions of the Relator. Eventually, I had no alternative but to quit
 3 my position at the Hospital – a place I had grown to love and miss to this day.

4 7. Based on the above, I fear that any video-recording of my deposition
 5 would be used by the Relator to distort the truth and to further damage my
 6 reputation and right to privacy. I imagine that she could cause any video-recording
 7 to be placed on the internet and/or to be distorted. This is why I refused to be video-
 8 recorded at my February 6, 2013 deposition. I did not know that the Relator's
 9 counsel intended to videotape the deposition until I saw the videotaping equipment
 10 at the deposition on the morning of February 6. Even though Mr. Hooper, my
 11 attorney, sent me a copy of the deposition notice, which I did not read, I still did not
 12 know my deposition would be videotaped. I was prepared to go forward with my
 13 deposition on February 6, 2013, if it would not be videotaped. However, the
 14 Relator's attorney cancelled the deposition because I would not consent to being
 15 videotaped.

16 8. I do not understand why I am a defendant in this case – the only
 17 individual named as a defendant. I certainly never intended to be subject to the
 18 adverse publicity generated by this lawsuit. I am a private person and have worked
 19 very hard to build and maintain my reputation as an advocate for quality mental
 20 health care. I am asking the Court to help me.

21 Executed this 12th day of February, 2013, in Los Angeles, California.

22 I declare under penalty of perjury under the laws of the United States that the
 23 foregoing is true and correct.

24 *Linda Pitman by PATRIC Hooper*
 25 LINDA PITMAN *pursuant*
 26 *to permission*
 27 *of L. Parks*
 28

PROOF OF SERVICE**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 1875 Century Park East, Suite 1600, Los Angeles, California 90067-2517.

On February 12, 2013, I served true copies of the following document(s) described as **PARKS' DECLARATION IN SUPPORT OF HER MOTION FOR PROTECTIVE ORDER** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Hooper, Lundy & Bookman, P.C.'s practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on February 12, 2013, at Los Angeles, California.


 Patti Newler

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Case No. 2:10-cv-1031 JAK (RZx)

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